



Your business  
is our business.

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: www.jsitel.com, e-mail: jsi@jsitel.com

April 9, 2018

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Attention: Wireline Competition Bureau

**RE: Notification of Discontinuance of Common-Carriage Tariffed Wireline  
Broadband Internet Access Service ("WBIAS") and Initiation of Provision on  
a Permissive Detariffed Common-Carriage Basis by:**

**Valley Telephone Cooperative, Inc.  
FCC Registration Number 0001685718  
Study Area Code 442159**

**CC Docket No. 02-33**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of Valley Telephone Cooperative, Inc. ("Company") respectfully files the attached notice pursuant to the *Wireline Broadband Order* of the intent of the Company to discontinue its Wireline Broadband Internet Access Service ("WBIAS") offerings under an interstate access tariff filed with the Federal Communications Commission. The Company currently offers WBIAS in the form of Digital Subscriber Line ("DSL") Access Service pursuant to NECA Tariff F.C.C. No. 5. Effective July 3, 2018, the Company will exit NECA Tariff F.C.C. No. 5 and become an issuing carrier for the JSI Tariff F.C.C. No. 1. However, the Company's joining of the JSI Tariff F.C.C. No. 1 will be exclusive of WBIAS.

Upon discontinuance of the tariffed offerings, the Company will provide WBIAS on a common-carriage non-tariffed basis. See *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sept. 23, 2005), ("*Wireline Broadband Order*").

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

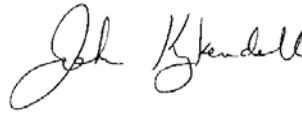
Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve, Eagan, MN 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
Bldg. B-3, Suite 200, Atlanta, GA 30328  
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
Bountiful, UT 84010  
phone: 801-294-4576, fax: 801-294-5124

Any questions regarding the notice may be directed to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall  
Vice President  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

Attachment

cc: Valley Telephone Cooperative, Inc.  
Special Assistant for Telecommunications at the Department of Defense  
The Office of the Honorable Greg Abbott, Governor of Texas  
Texas Public Utilities Commission  
National Exchange Carrier Association

**Notice of Permissive Detariffing of Wireline Broadband Internet Access Service  
Effective July 3, 2018 by  
VALLEY TELEPHONE COOPERATIVE, INC. – SAC 442159  
881 East Hidalgo Avenue, Raymondville, TX 78580  
956-642-1124  
CC Docket No. 02-33**

Valley Telephone Cooperative, Inc. (“Company”) hereby provides notice that it plans to terminate provision of wireline broadband Internet access service (“WBIAS”) on a tariffed basis effective July 3, 2018 at which time it plans to offer permissive detariffed WBIAS on a Title II common-carriage basis pursuant to paragraph 94 of the Federal Communications Commission’s *Wireline Broadband Order*.<sup>1</sup> The Company currently offers WBIAS through Digital Subscriber Line (“DSL”) Access Service under NECA Tariff F.C.C. No. 5.

Effective July 3, 2018, the Company will be canceled by NECA as an issuing carrier for NECA Tariff F.C.C. No. 5 concurrent with the Company becoming an issuing carrier for JSI Tariff F.C.C. No. 1, exclusive of WBIAS.

**Impact on Customers**

The only customer for the Company’s WBIAS is the Company’s nonregulated Internet Service Provider (“ISP”) operation. The discontinuance of the tariffed offering of WBIAS will have no effect on the end user service provided by the Company’s ISP operation.

**Serving Area**

The Company’s provision of WBIAS is limited to its ILEC serving area in Texas.

**Future Availability of WBIAS on a Permissive-Detariffed Common Carriage Basis**

The Company will continue to make WBIAS available on a common-carriage basis through posting of rates, terms and conditions on its Internet web-site in a manner similar to that required for interstate and international interexchange services under Section 42.10 of the FCC’s rules (47 C.F.R. § 42.10).

---

<sup>1</sup> See *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sept. 23, 2005), (“*Wireline Broadband Order*”).

**VALLEY TELEPHONE COOPERATIVE, INC.**  
881 East Hidalgo Avenue, Raymondville, TX 78580  
956-642-1124

**WBIAS DETARIFFING TIMELINE**

**April 9, 2018**

**30-Day Notice filed with following:**

Federal Communications Commission (under CC Docket No. 02-33)  
Special Assistant for Telecommunications at the Department of Defense  
The Office of the Honorable Greg Abbott, Governor of Texas  
Texas Public Utilities Commission  
National Exchange Carrier Association

**April 9, 2018**

Notice to customers. As indicated above, the only customer for the Company's wireline broadband Internet Access Service ("WBIAS") is the Company's nonregulated ISP operation. The 30-day notice to the ISP will be provided by interoffice memorandum cover with this notice attached.

**June 18, 2018**

Expected filing by National Exchange Carrier Association ("NECA") with the Federal Communications Commission ("FCC") on 15-day notice of a tariff transmittal that will include, inter alia, cancellation of Valley Telephone Cooperative, Inc. as an issuing carrier for NECA Tariff F.C.C. No. 5.

**June 18, 2018**

Expected filing by John Staurulakis Inc., ("JSI") of a transmittal adding Valley Telephone Cooperative, Inc. as an issuing carrier for JSI Tariff F.C.C. No. 1 exclusive of WBIAS.

**July 3, 2018**

Planned effective date for cancellation by NECA of Valley Telephone Cooperative, Inc. as an issuing carrier for NECA Tariff F.C.C. No. 5. Planned effective date for addition of Valley Telephone Cooperative, Inc. as an issuing carrier for JSI Tariff F.C.C. No. 1 exclusive of WBIAS.

**July 3, 2018 Forward**

Valley Telephone Cooperative, Inc. WBIAS available on common-carriage non-tariffed basis under rates, terms and conditions posted at [www.vtx1.net](http://www.vtx1.net) or available during business hours at the above address.

## CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notification of Discontinuance of Tariffed Common Carrier Wireline Broadband Internet Access Service was served this 9th day of April, 2018, by mailing true and correct copies thereof, postage prepaid, to the following persons:

Secretary of Defense  
Attn: Special Assistant for Telecommunications  
1000 Defense Pentagon  
Washington, D.C. 20301-1000

The Honorable Greg Abbott  
Office of the Governor  
P.O. Box 12428  
Austin, TX 78711

Texas Public Utilities Commission  
1701 N. Congress Avenue  
Austin, TX 78711

National Exchange Carrier Association  
80 South Jefferson Road  
Whippany, New Jersey 07981

  
\_\_\_\_\_